

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FTX TRADING LTD., <i>et al.</i> , ¹	Case No. 22-11068 (KBO)
Debtors.	(Jointly Administered)
Hearing Date: February 27, 2025 at 10:00 a.m. (ET)	
Objection Deadline: February 20, 2025 at 4:00 p.m. (ET)	
Ref. Nos. 29166 & 29175	

**CERTIFICATION OF COUNSEL REGARDING DEBTORS'
ONE HUNDRED FORTY-FIRST (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On January 8, 2025, the FTX Recovery Trust filed the *Debtors' One Hundred Forty-First (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims)* [D.I. 29166, redacted & 29175, sealed] (the "Objection").
2. Pursuant to the Notice of Objection attached to the Objection [D.I. 29166-1 & 29175-1], any responses to the Objection were to be filed no later than February 20, 2025, at 4:00 p.m. (ET) (the "Response Deadline").
3. On February 5, 2025, Ching-Lieh Li ("Li") filed a response to the Objection [D.I. 29515] (the "Li Response").

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors' confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

4. On February 12, 2025, Gonia Chan (“Chan”) filed a response to the Objection [D.I. 29575] (the “Chan Response”).

5. On February 18, 2025, Yu-Ling Hsia (“Hsia”) filed a response to the Objection [D.I. 29597] (the “Hsia Response”).

6. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

7. The Chan Response, Li Response and Hsia Response were resolved without changes to the proposed form of order. For the Court’s convenience, the proposed form of order that was attached to the Objection (the “Proposed Order”) is attached hereto as **Exhibit A**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: April 1, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Christian P. Jensen (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
jensenc@sullcrom.com

Counsel for the FTX Recovery Trust